

## REMARKS

Applicants respectfully request further examination and reconsideration in view of the instant response. Claims 1, 3, 5-11 and 20-28 remain pending in the case. Claims 2, 4, and 12-19 are cancelled herein without prejudice. Claims 1-11 and 20-28 are rejected. Claims 1, 20, 26 and 27 are amended herein. No new matter has been added.

### 35 U.S.C. §112, second paragraph

Claim 20 is rejected under 35 U.S.C. §112, second paragraph, as failing to point out and distinctly claim the subject matter which Applicants regard as the invention. In particular, the limitation "said light source" has insufficient antecedent basis. Applicants have amended Claim 20 here, replacing the limitation "said light source" with the limitation "said light emitting diode," for which there is sufficient antecedent basis. Applicants respectfully note that Claims 23, 26 and 27 recited a similar limitation as Claim 20, and are also amended herein. Therefore, Applicants respectfully assert that Claim 20 overcomes the rejection under 35 U.S.C. §112, second paragraph.

### 35 U.S.C. §102(e)

Claims 1, 3, 5-11 and 20-28 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication 2005/0212089 by Kiyomoto et al., hereinafter referred to as the "Kiyomoto" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of

the present invention as recited in Claims 1-11 and 20-28 are not anticipated by Kiyomoto.

Applicants respectfully direct the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

A light emission device comprising:  
a lead frame comprising a first lead frame segment and a second lead frame segment, wherein said first lead frame segment comprises a first recess, wherein said first recess is a reflector cup;  
a light source coupled to said first lead frame segment, wherein said light source resides at least partially within said first recess;  
a wire bond coupled to said light source and coupled to said second lead frame segment; and  
an epoxy cast encasing said light source, said wire bond, and a portion of said lead frame.

Independent Claim 20 recites similar limitations. Claims 3 and 5-11 that depend from independent Claim 1 and Claims 21-28 that depend from independent Claim 20 provide further recitations of the features of the present invention.

Kiyomoto and the claimed invention are very different. Applicants understand Kiyomoto to teach a light emission source including a separate light reflecting portion, wherein the lead frame does not include a recess for locating a light emitter. In particular, Kiyomoto does not teach, describe or suggest a light emission device including “a lead frame comprising a first lead frame segment

and a second lead frame segment, wherein said first lead frame segment comprises a first recess," as claimed (emphasis added).

Examiner asserts that Figure 10 and paragraphs [0176] through [0187] of Kiyomoto teaches that "first lead frame segment 17 comprises a first recess such that said light source 12 resides at least partially within said first recess." Applicants respectfully submit that light emission source 24 of Kiyomoto does not teach a recess in a lead frame. Figure 9 of Kiyomoto illustrates a perspective view of the light emission source 24 of Figure 10. Applicants respectfully assert that light emitter 12 is mounted to stem 15 ([0184]). Moreover, Applicants respectfully assert that Kiyomoto does not teach, describe or suggest a lead frame including a recess.

Moreover, with regards to the rejection of Claims 1 and 22, Applicants respectfully assert that Kiyomoto does not teach, describe or suggest "wherein said first recess is a reflector cup," as claimed. Applicants have reviewed the cited reference, and have been unable to find any such teaching.

Moreover, with regards to the rejection of Claims 2 and 21, Applicants respectfully assert that Kiyomoto does not teach, describe or suggest "wherein said first lead frame segment comprises a second recess such that said epoxy cast is anchored to said first lead frame segment," as claimed. Applicants have reviewed the cited reference, and have been unable to find any such teaching. In particular, Applicants respectfully assert that Kiyomoto is silent as to the lead

frames including any recesses, as described above, and is silent as to the use of recesses in anchoring an epoxy cast to a lead frame segment.

Moreover, with regards to the rejection of Claims 6 and 24, Applicants respectfully assert that Kiyomoto does not teach, describe or suggest “wherein said lead frame comprises plating,” as claimed. Applicants have reviewed the cited reference, and have been unable to find any such teaching.

Moreover, with regards to the rejection of Claims 9 and 27, Applicants respectfully assert that Kiyomoto does not teach, describe or suggest a light emission device “further comprising a second wire bond coupled to said first lead frame segment and said light source,” as claimed. Applicants have reviewed the cited reference, and have been unable to find any such teaching.

Applicants respectfully assert that nowhere does Kiyomoto teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 1 and 20, that these claims overcome the rejection under 35 U.S.C. § 102(e), and are in a condition for allowance. Therefore, Applicants respectfully submit that Kiyomoto also does not teach, disclose or suggest the additional claimed features of the present invention as recited in Claims 3 and 5-11 that depend from independent Claim 1 and Claims 21-28 that depend from independent Claim 20. Applicants respectfully submit that Claims 3, 5-11 and 21-28 overcome the rejection under 35 U.S.C. § 102(e) as these claims are dependent on an allowable base claim.

### CONCLUSION

Based on the arguments presented above, Applicants respectfully assert that Claims 1, 3, 5-11 and 20-28 overcome the rejections of record and, therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,  
WAGNER, MURABITO & HAO LLP

Date: 6 Jan 2006



Matthew J. Blecher  
Reg. No. 46,558

Two North Market Street  
Third Floor  
San Jose, California 95113  
(408) 938-9060